

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CONNECTICUT GENERAL LIFE  
INSURANCE COMPANY AND  
CIGNA HEALTH AND LIFE  
INSURANCE COMPANY

Plaintiff,

VS.

HUMBLE SURGICAL HOSPITAL, LLC

Defendant.



## JURY DEMANDED

CIVIL ACTION NO.: 4:13-CV-3291

**HUMBLE SURGICAL HOSPITAL, LLC'S**  
**NOTICE OF FORTHCOMING BRIEF**

Defendant Humble Surgical Hospital, LLC (“Humble”) respectfully provides notice to the Court regarding its forthcoming response regarding the pending motion to unseal various records in this case.

On June 27, 2016, Petitioner Thomas J. Pliura (“Pliura”) moved to intervene for the limited purpose of unsealing certain pleadings, exhibits, and trial transcripts. Doc. 259. On June 29, 2016, the Court ordered Plaintiff CIGNA to submit a response on an expedited basis. Doc. 260. CIGNA submitted its responses, objecting in part, on July 11, 2016. Doc. 265.

Humble intends to submit briefing on this issue shortly. Humble generally agrees that patients' protected health information should not be disclosed to the public, and likewise generally agrees that certain information may be confidential. However, as to the trial transcript, the bulk of the testimony can and should be unsealed. Humble intends to detail its objections/agreements in the same manner as CIGNA's pleading.

Dated: July 13, 2016

Respectfully submitted,

By: /s/ John P. Lahad

Brian D. Melton  
Southern District of Texas No. 26016  
State Bar No. 24010620  
[bmelton@susmangodfrey.com](mailto:bmelton@susmangodfrey.com)  
Jonathan J. Ross  
Southern District of Texas No. 18293  
State Bar No. 00791575  
[jross@susmangodfrey.com](mailto:jross@susmangodfrey.com)  
John P. Lahad  
Southern District of Texas No. 1114929  
State Bar No. 24068095  
[jlahad@susmangodfrey.com](mailto:jlahad@susmangodfrey.com)  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, Texas 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666

*ATTORNEYS FOR DEFENDANT  
HUMBLE SURGICAL HOSPITAL LLC*

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served on the undersigned counsel via ECF, on the 13th day of July 2016, as follows:

John B. Shely  
Brian Pidcock  
**ANDREWS KURTH LLP**  
600 Travis Street, Suite 4200  
Houston, Texas 77002  
(713) 220-4152  
(713) 238-7206 fax

*Attorneys for Plaintiffs*

/s/ John P. Lahad  
John P. Lahad